

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JING ZHANG, WEI FAN, MINGLIAN ZHANG, AND)
JUN ZHOU,)
Plaintiffs)
v.) 21-cv-01625 (GHW)(BCM)
XUEYUAN HAN, HANFOR HOLDINGS CO., LTD., HF)
HOLDINGS LIMITED., HANFOR CAPITAL)
MANAGEMENT CO., LTD., NUOYUAN CAPITAL)
MANAGEMENT COMPANY LTD., GEORGE XU,)
JUNJUN FENG, WENNAN AO, BZ INDUSTRIAL)
(CHINA), BZ INDUSTRIAL (VIRGIN ISLANDS), BZ)
INDUSTRIAL (CAYMAN ISLANDS), HANFOR)
(CAYMAN) LIMITED, HFRE LLC, HF CAPITAL)
MANAGEMENT CAY INC., HF COSMOPOLITAN)
BETA L.P., HENGTAI SECURITIES CO., LTD., JOHN)
DOES 1-10, JANE DOES 1-10, AND ABC-XYZ CORP.)
1-10,)
Defendants.)

Jeffrey S. Boxer, an attorney duly admitted practice law before the Courts of the State of New York, declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am a Partner at Carter Ledyard & Milburn LLP, attorneys for Defendants Xueyuan Han, Hanfor Holdings Co., Ltd., HF Holdings Limited, Hanfor Capital Management Co., Ltd., Nuoyuan Capital Management Company Ltd., George Xu, Junjun Feng, Wennan Ao, BZ Industrial (China), BZ Industrial (Virgin Islands), BZ Industrial (Cayman Islands), Hanfor (Cayman) Limited, HFRE LLC, HF Capital Management Cay Inc., HF Cosmopolitan Beta L.P. (collectively “Defendants”). I make this declaration in opposition to Plaintiffs’ application for an attachment.

2. A copy of Defendants' letter pursuant to Rule 2(C) of the Court's individual rules of practice requesting a pre-motion conference concerning an anticipated motion to dismiss all claims against the Defendants pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(5), and 12(b)(6) which was filed earlier today is attached as **Exhibit A**.

3. A true and correct copy of a printout from Yahoo! Finance showing the share price of NIO Limited (NIO) from February 9, 2021 to March 18, 2021 is attached as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 19, 2021
New York, New York

~~Jeffrey S. Boxer~~